



# **ILLINOIS COMMERCE COMMISSION** **2021 Summer Preparedness Policy Session**

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## **Illinois Consumers/Ratepayers Advocates' Perspectives**

**June 15, 2021**

THE OFFICE OF THE ATTORNEY GENERAL OF THE STATE OF ILLINOIS

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## Today's Agenda

- Ongoing Challenges: Energy Insecurity & Energy Burden
- Winter Disconnection Moratorium, the March 15 Stipulation
- A Closer Look: Stipulation Reports, Arrearage Data From Utilities
- Meeting the Challenges: Takeaways & Recommendations



## Ongoing Challenges: Minimize Energy Insecurity



- **Energy Insecurity** describes an Illinois consumer's inability to adequately meet basic household heating, cooling, and energy needs. It conjures various equity issues, all of which seek to minimize having residents dangerously under-heat or under-cool their homes or forego other essentials such as rent or mortgage payments, food or medicine.



# Ongoing Challenges: Reduce High, Severe Energy Burdens



- **Energy Burden** is a metric researchers use to understand what levels of Energy Insecurity consumers are facing. It means the share of household income used to pay annual energy costs.
  - An energy burden greater than six percent (> 6%) is a **high energy burden**.
  - An energy burden greater than 10 percent (> 10%) is a **severe energy burden**.

<sup>1</sup> Ariel Dreihobl, Lauren Ross, & Roxana Ayala. "How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden Across the United States," American Council for an Energy-Efficient Economy, 11 (September 10, 2020). Available at: <https://www.aceee.org/research-report/u2006> (hereinafter, "AEEE September 2020 Report").

<sup>2</sup> *Id.* at ii. This definition comes from a widely accepted principle that total shelter costs should not exceed 30 percent of income and that utility costs should not exceed 20 percent of those shelter costs, leading to the conclusion that an affordable energy burden should be at or below six percent of household income (20% x 30% = 6%). See also, U.S. Department of Energy, Energy Efficiency and Renewable Energy Office, "Clean Energy for Low Income Communities Accelerator Fact Sheet," available at <https://betterbuildingssolutioncenter.energy.gov/sites/default/files/attachments/Better%20Buildings%20Clean%20Energy%20for%20Low%20Income%20Communities%20Accelerator%20Factsheet.pdf>.



## 92% of low-income IL households have severe energy burdens

- There are **1.435 million Illinois households** that struggle at/below 200% of the FPL. Nearly half of these households have a severe energy burden of 16% and 30%.<sup>1</sup>
- According to a September 2020 study, the Energy Burden for **a median household in the United States is 3.1% of income**.<sup>2</sup>
  - Low-Income households spend **three times more** of their income on energy costs compared to the median spending of non-low-income households (8.1% vs. 2.3%).
  - In Chicago, **1 out of 5 households** (or 704,117 of 3.56 million) have a high energy burden (> 6%). Over 50% of these households also are categorized with a severe energy burden (> 10%).

<sup>1</sup> See Fisher, Sheehan & Colton, Home Energy Affordability Gap (2<sup>nd</sup> Series), Published April 2020. Available at [www.homeenergyaffordabilitygap.com](http://www.homeenergyaffordabilitygap.com).

<sup>2</sup> AEEE September 2020 Report, at 11.



# Winter period provided statutory relief from disconnections

- **Health and safety protections bar disconnections:**
  - “On any day when the National Weather Service forecast for the following 24 hours covering the area of the utility in which the residence is located includes a forecast that the temperature will be 32 degrees Fahrenheit or below” (220 ILCS 5/8-205(a)(1)); and
  - “During the period of time from **December 1 through and including March 31** of the immediately succeeding calendar year” (220 ILCS 5/8-206(a)).
- **However, the “Winter Disconnection Moratorium” also means:**
  - Consumer’s bills (and arrearages) can escalate with cold/colder temperatures.
  - Payment of high bills can be delayed until non-winter months (April 1).
  - **Flexible, generous, and reasonable** payment plans and assistance programs are essential to ensuring consumers can avoid disconnections between April and November.

<sup>1</sup> Ariel Dreihobl, Lauren Ross, & Roxana Ayala. “How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden Across the United States,” American Council for an Energy-Efficient Economy, 11, available at: <https://www.aceee.org/research-report/u2006> (hereinafter, “AEEE September 2020 Report”).



## March 15, 2021 stipulation revived key protections, benefits

- On March 15, 2021,<sup>1</sup> the Commission entered an order adopting a second stipulation reached between ICC Staff, Joint Consumer Parties,<sup>2</sup> and Large Investor-Owned Utilities.<sup>3</sup>
- The March 15 Stipulation revived critical **consumer protections**, including:
  - **Extended repayment plans.** The longer 18/24-month Deferred Payment Arrangements (“DPAs”) expired December 26, 2020. With entry of the March 15 Stipulation, large utility consumers have been and remain entitled to receive 18-month DPAs (with 10% down payment), upon verbally expressing financial hardship (no documentation required), through the end of this month (June).
    - Households earning less than 300% of the Federal Poverty Level (“FPL”) are entitled to receive 18-month DPAs (with 0% down payment).
  - **Disconnection assistance.** Households earning less than 300% of the Federal Poverty Level (FPL) will be reconnected upon payment of 25% (others will be required to pay the usual 100%) of the past due balance through July 10.

<sup>1</sup> Illinois Commerce Commission On Its Own Motion, In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act, ICC Docket No. 20-0309, Order on Reopening (March 15, 2021).

<sup>2</sup> The Office of the Illinois Attorney General; Citizens Utility Board (“CUB”); City of Chicago; Community Organizing and Family Issues (“COFI”); Legal Aid Society of Metropolitan Family Services, and Allen Cherry.

<sup>3</sup> Large Investor-Owned Utilities (“LIOUs”) comprised of Commonwealth Edison Co. (“ComEd”); Ameren Illinois Company (“AIC”); Northern Illinois Gas Company (“Nicor”); North Shore Gas Company (“NSG”); The Peoples Gas Light & Coke Company (“PGL”); Aqua Illinois, Inc. (“Aqua”); Illinois-American Water Company (“IAWC”); and Utility Services of Illinois, Inc. (“USI”). Small IOUs comprised of Consumers Gas Company (“Consumers Gas”); Illinois Gas Company (“IGC”); Liberty Utilities Corp. (“Liberty”); MidAmerican Energy Company (“MEC”); and Mt. Carmel Public Utility Company (“Mt. Carmel”).



# June 18, 2020 stipulation requires enhanced utility reporting

- The Stipulation requires monthly reporting from large and small utilities.
  - For large utilities, these reports provide data across sixteen distinct (16) metrics, which include the number of customers who are disconnected, receive disconnection notices, are assessed late payment fees or charges, and who enroll in new DPAs.<sup>1</sup> **Utility reports provide each metric by zip code.**
  - Small utilities are similarly required to report metrics such as the number of customers who are disconnected, and who enroll in new DPAs.
  - Note the data in the compliance reports filed by Ameren and Mid-American do not separate or distinguish between electric and natural gas customers.
- The Stipulation also requires quarterly reporting regarding Covid-19 related costs.
- Utilities will continue file monthly reports in ICC Docket Number 20-0309 through August 31, 2021, and the quarterly reports through December 31, 2022.

<sup>1</sup> Illinois Commerce Commission On Its Own Motion, In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act, ICC Docket No. 20-0309, Order, at Ex. 1 (June 18, 2020).



## Compliance reports: Invaluable tools to address energy burden





## Compliance reports: Invaluable tools to address energy burden





# Disconnections Resume

Investor-Owned Utility	Sept - Nov. 2020		April '21			
	Disconnections: All Residential Customers (Sept-Nov. 2020)	Avg. Monthly Disconnections (Sept-Nov. 2020)	Disconnections: Non Low-Income Residential Customers	Disconnections: Low-Income Residential Customers	Total Disconnections: All Residential Customers	(%) All Residential Customers
<i>Commonwealth Edison</i>	50,380	16,793	13,071	156	13,227	0.36%
<i>Ameren Illinois</i>	22,829	7,610	3,420	212	3,632	0.31%
<i>Nicor Gas</i>	0	0	767	7	774	0.04%
<i>North Shore Gas</i>	162	54	1	0	1	0.00%
<i>Peoples Gas Light &amp; Coke</i>	932	311	44	0	44	0.01%
<i>Aqua Illinois</i>	412	137	380		380	0.52%
<i>Illinois-American Water</i>	6074	2,025	2,034		2,034	0.60%
<i>Utility Services of Illinois</i>	0	0	0		0	0.00%
Totals >>>	80,789	26,930	19,717	375	20,092	0.24%

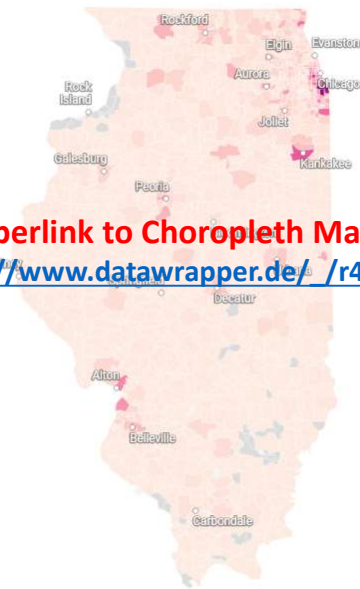
**Staggered Disconnections.** The March 15 Stipulation limited large utilities to disconnections based on a customer's arrearage amount. Large utilities were permitted to carry out disconnections only of those customers who have 150% or more of their January Arrearage during April 1-30, and thereafter, from May 1-31, those who have 100% or more of their January Arrearage. Utilities may resume disconnections of other eligible customers as of June 1.



# Compliance reports: Disconnection Notices

## Disconnection Notices (Residential Customers)

April 2021: Large Investor-Owned Utilities



[ Hyperlink to Choropleth Map ]  
<https://www.datawrapper.de/r4z5f/>

Large Investor-Owned Utilities: Commonwealth Edison Co.; Ameren Illinois Company d/b/a Ameren Illinois; Northern Illinois Gas Company d/b/a Nicor Gas Company; North Shore Gas Company; Peoples Gas Light & Coke Company; Aqua Illinois, Inc.; Illinois-American Water Company; and Utility Services of Illinois, Inc.  
 Get the data - Created with Datawrapper

**Disconnection Notices.** Among the 10 zip codes in Sept. '20 that received the highest number of disconnection notices, only four (4) of them are among the highest in April 2021, suggesting that the State's economic hardships are continuing to take their toll on all Illinoisans.

## Disconnection Notices (All Residential Customers)

April 2021, Large Investor-Owned Utilities

Rank* (Apr. '21)	Rank* (Sept. '20)	Zip Code	Des.^	(Dis)connection Notices	Pop.**	% Pop.	Median HH Income	Poverty (%)**	Race/Ethnicity**
1	12	60619	Chatham	3,020	61,207	4.9%	\$35,629	21.7%	Black (95.4%), White (1.5%), Hispanic (1.3%)
2	18	60620	Auburn Gresham	2,858	67,711	4.2%	\$36,767	22.3%	Black (95.4%), Hispanic (1.8%), White (1.3%)
3	14	60628	Roseland	2,729	64,254	4.2%	\$41,169	18.9%	Black (92.6%), Hispanic (3.5%), White (2.1%)
4	7	60617	South Chicago	2,577	83,553	3.1%	\$41,125	19.3%	Black (56.2%), Hispanic (37.2%), White (5.9%)
5	10	60649	South Shore	2,292	46,633	4.9%	\$31,921	25.2%	Black (93.0%), White (2.6%), Hispanic (2.5%)
6	530	60623	South Lawndale	2,275	81,283	2.8%	\$32,460	25.7%	Hispanic (66.8%), Black (29.7%), White (2.9%)
7	211	60637	Woodlawn	2,029	47,300	4.3%	\$28,965	29.9%	Black (74.9%), White (14.7%), Asian (4.7%)
8	24	60901	Kankakee County	1,955	35,407	5.5%	\$48,319	17.1%	White (52.7%), Black (31.2%), Hispanic (14.6%)
9	3	60629	Chicago Lawn	1,841	110,029	1.7%	\$43,506	15.9%	Hispanic (71.6%), Black (19.2%), White (7.7%)
10	9	60411	Chicago Heights	1,788	57,603	3.1%	\$47,769	18.3%	Black (50.2%), Hispanic (27.6%), White (18.6%)

\*Rank based on all residential customers (non low-income and low-income)

\*\*Source: <https://www.illinois-demographics.com> (U.S. Census Bureau ACS Estimates)

^Source: <https://www.unitedstateszipcodes.org>



## Compliance reports: Invaluable tools to address energy burden





# Compliance reports: Late Payment Fees/Charges

## Assessment of Late Payment Fees or Charges (Residential Customers)

April 2021: Large Investor-Owned Utilities



[ Hyperlink to Choropleth Map ]  
<https://www.datawrapper.de//hxMQo/>

Large Investor-Owned Utilities: Commonwealth Edison Co.; Ameren Illinois Company d/b/a Ameren Illinois; Northern Illinois Gas Company d/b/a Nicor Gas Company; North Shore Gas Company; Peoples Gas Light & Coke Company; Aqua Illinois, Inc.; Illinois-American Water Company; and Utility Services of Illinois, Inc.  
 Get the data - Created with Datawrapper

**Late Payment Fees/Charges.** Since November 2020, large utilities have charged, on average, every month, over 1.4 million residential customers with late fees – that is over 17% of all large utility customers.

## Assessment of Late Payment Fees or Charges (All Residential Customers)

April 2021, Large Investor-Owned Utilities

Rank* (Apr. '21)	Rank* (Sept. '20)	Zip Code	Des.^	# Fees, Charges	Pop.**	% Pop.	Median HH Income	Poverty (%)**	Race/Ethnicity**
1	3	60620	Auburn Gresham	21,804	67,711	32.2%	\$36,767	22.3%	Black (95.4%), Hispanic (1.8%), White (1.3%)
2	1	60619	Chatham	21,037	61,207	34.4%	\$35,629	21.7%	Black (95.4%), White (1.5%), Hispanic (1.3%)
3	6	60649	South Shore	19,468	46,633	41.7%	\$31,921	25.2%	Black (93.0%), White (2.6%), Hispanic (2.5%)
4	2	60617	South Chicago	18,700	83,553	22.4%	\$41,125	19.3%	Black (56.2%), Hispanic (37.2%), White (5.9%)
5	8	60623	South Lawndale	18,521	81,283	22.8%	\$32,460	25.7%	Hispanic (66.8%), Black (29.7%), White (2.9%)
6	4	60629	Chicago Lawn	18,171	110,029	16.5%	\$43,506	15.9%	Hispanic (71.6%), Black (19.2%), White (7.7%)
7	50	60901	Kankakee County	17,917	35,407	50.6%	\$48,319	17.1%	White (52.7%), Black (31.2%), Hispanic (14.6%)
8	9	60628	Roseland	17,158	64,254	26.7%	\$41,169	18.9%	Black (92.6%), Hispanic (3.5%), White (2.1%)
9	5	60637	Woodlawn	16,512	47,300	34.9%	\$28,965	29.9%	Black (74.9%), White (14.7%), Asian (4.7%)
10	11	60651	Humboldt Park	14,462	63,492	22.8%	\$38,955	22.0%	Black (50.8%), Hispanic (42.9%), White (4.4%)

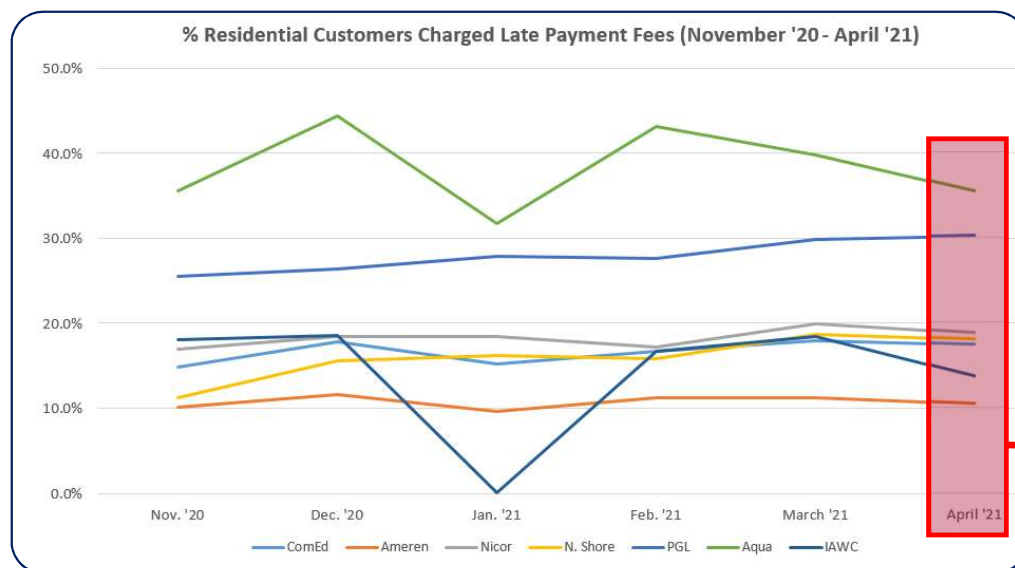
\*Rank based on all residential customers (non low-income and low-income)

\*\*Source: <https://www.illinois-demographics.com> (U.S. Census Bureau ACS Estimates)

^Source: <https://www.unitedstateszipcodes.org>



# Compliance reports: Late Payment Fees/Charges



Investor-Owned Utility*	Nov. '20	Dec. '20	Jan. '21	Feb. '21	March '21	April '21
ComEd	14.80%	17.88%	15.24%	16.73%	17.91%	17.48%
Ameren	10.08%	11.63%	9.59%	11.30%	11.25%	10.49%
Nicor	17.01%	18.50%	18.39%	17.18%	19.95%	18.87%
N. Shore	11.21%	15.57%	16.24%	15.82%	18.72%	18.02%
PGL	25.54%	26.44%	27.93%	27.60%	29.85%	30.23%
Aqua	35.59%	44.37%	31.69%	43.12%	39.82%	35.39%
IAWC	18.02%	18.53%	0.09%	16.69%	18.42%	13.67%

\*USI did not assess/charge late payments during time period

Investor-Owned Utility*	April '21	
	Accounts Charged Late Payments	% Residential Customers
ComEd	647,400	17.48%
Ameren	122,830	10.49%
Nicor	388,835	18.87%
N. Shore	27,080	18.02%
PGL	243,313	30.23%
Aqua	26,053	35.39%
IAWC	46,710	13.67%
Totals >>>	1,502,221	18.06%

- Across the six-month period (Nov. '20 – April '21), ComEd has – on average – charged over 617,000, or 16.7% of its residential customers monthly with late payment fees. PGL has consistently charged 226,550, or nearly 28% of its residential customers, each month over this same period.
- Small variance in month-to-month charges (by %) strongly suggests that the same residents are being charged.



## Compliance reports: Invaluable tools to address energy burden





# Compliance reports: Customers Newly Enrolled in DPAs

## Newly Enrolled in DPA (Residential Customers)

April 2021: Large Investor-Owned Utilities

Legend

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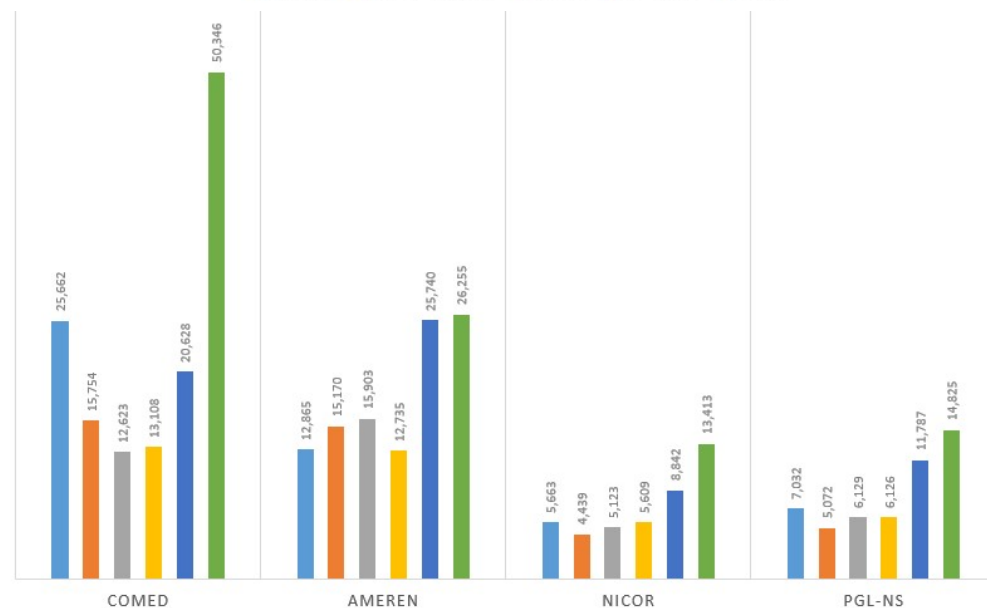
[ Hyperlink to Choropleth Map ]  
<https://www.datawrapper.de//xUSn0/>

Large Investor-Owned Utilities: Commonwealth Edison Co.; Ameren Illinois Company d/b/a Ameren Illinois; Northern Illinois Gas Company d/b/a Nicor Gas Company; North Shore Gas Company; Peoples Gas Light & Coke Company; Aqua Illinois, Inc.; Illinois-American Water Company; and Utility Services of Illinois, Inc.

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## RESIDENTIAL CUSTOMERS NEWLY ENROLLED IN DPA DURING MONTHS NOV. 2020 – APRIL 2021

■ Nov. '20 ■ Dec. '20 ■ Jan. '21 ■ Feb. '21 ■ March '21 ■ April '21



**New DPA enrollment.** Although ComEd doubled the number of new DPA enrollments in April 2021 (compared to March), it has enrolled – on average – just over 23,000 customers each month since November 2020. Combined, about 58,000, or 4% of large utilities' residential customers are enrolling in new DPAs each month.



# Compliance reports: Customers Newly Enrolled in DPAs

<i>Ameren</i>				
Zip Code	# Residential Customers with Arrearage*	Total Arrearage	# Newly Enrolled DPAs	Rank: # Newly Enrolled DPAs
61832	3,130	\$ 2,434,457.72	625	5
62040	2,902	\$ 2,040,573.78	622	6
61604	2,693	\$ 2,245,707.24	776	1
62526	2,641	\$ 2,079,692.42	756	2
62521	2,522	\$ 2,066,294.54	651	4

<i>Commonwealth Edison</i>				
Zip Code	# Residential Customers with Arrearage*	Total Arrearage	# Newly Enrolled DPAs	Rank: # Newly Enrolled DPAs
60619	5,708	\$ 2,340,429.19	1,503	2
60623	5,245	\$ 2,112,663.70	1,081	7
60649	5,142	\$ 1,866,630.85	1,313	4
60620	4,986	\$ 2,122,009.83	1,736	1
60617	4,723	\$ 1,903,663.65	1,076	8

<i>Nicor</i>				
Zip Code	# Residential Customers with Arrearage*	Total Arrearage	# Newly Enrolled DPAs	Rank: # Newly Enrolled DPAs
60411	2,764	\$ 1,449,057.40	394	1
60804	2,688	\$ 1,266,691.06	263	2
60402	1,917	\$ 726,721.62	208	7
60426	1,701	\$ 1,003,899.49	211	6
60505	1,499	\$ 577,978.42	167	12

- Data enables identification and evaluation of DPA assistance in zip codes with highest number of residential customers with an overdue balance of 1-month or more.
- Data helps to track whether zip codes for most newly enrolled DPAs correspond with those where more residents are behind on their utility bills.

<i>Peoples Gas Light &amp; Coke</i>				
Zip Code	# Residential Customers with Arrearage*	Total Arrearage	# Newly Enrolled DPAs	Rank: # Newly Enrolled DPAs
60620	12,302	\$ 10,562,276.75	991	2
60619	11,749	\$ 10,402,490.90	839	3
60623	11,293	\$ 9,181,534.98	579	8
60617	11,272	\$ 10,348,005.07	822	4
60628	10,852	\$ 10,756,739.96	1045	1

<i>North Shore Gas</i>				
Zip Code	# Residential Customers with Arrearage*	Total Arrearage	# Newly Enrolled DPAs	Rank: # Newly Enrolled DPAs
60085	6,007	\$ 2,927,181.31	212	1
60099	2,598	\$ 1,212,012.52	133	2
60087	2,356	\$ 865,720.11	76	3
60064	1,799	\$ 835,530.66	58	5
60060	1,632	\$ 466,065.82	47	6

\*Source: April 2021 supplemental arrearage data and compliance reports



## Compliance reports: Invaluable tools to address energy burden

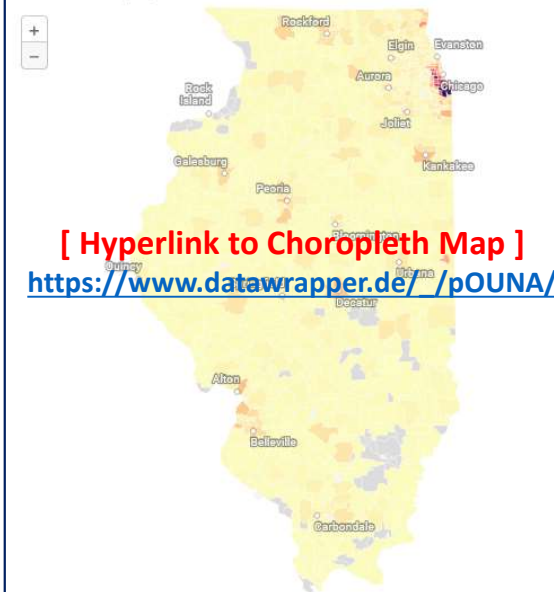




# Past due balances have risen 11.5% since April 2020

## Arrearage, Total Dollars (\$) (Residential Customers)

April 2021: Large Investor-Owned Utilities



[ Hyperlink to Choropleth Map ]

<https://www.datawrapper.de/?p=OUNA/>

Large Investor-Owned Utilities: Commonwealth Edison Co.; Ameren Illinois Company d/b/a Ameren Illinois; Northern Illinois Gas Company d/b/a Nicor Gas Company; North Shore Gas Company; Peoples Gas Light & Coke Company; Aqua Illinois, Inc.; Illinois-American Water Company; and Utility Services of Illinois, Inc. \* (\*Zip codes approximated by city/location description because zip codes not indicated)  
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**Arrearages, Total Dollars (\$).** At least 88 zip codes for large-utility service areas have residential arrearages in excess of \$1 million. In total, among large utilities, as of April 2021, residential customers have over \$437.5 million in overdue balances – an 11.5% increase from the prior year (April 2020 residential arrearage: \$392.3 million).

## Arrearages (1-month or more overdue), Total Dollars (All Residential Customers)

April 2021, Large Investor-Owned Utilities

Rank* (Apr. '21)	Zip Code	Des. <sup>^</sup>	Arrearages***	Pop.**	# Res. w/ Arrearage <sup>^^</sup>	\$(Resi. w/ Arrearage)	% Pop. w/ Arrearage	Poverty (%)**	Race/Ethnicity**
1	60628	Roseland	\$ 13,148,711	64,254	15,543	\$ 845.96	24.2%	18.9%	Black (92.6%), Hispanic (3.5%), White (2.1%)
2	60619	Chatham	\$ 12,754,643	61,207	17,525	\$ 727.80	28.6%	21.7%	Black (95.4%), White (1.5%), Hispanic (1.3%)
3	60620	Auburn Gresham	\$ 12,684,287	67,711	17,288	\$ 733.70	25.5%	22.3%	Black (95.4%), Hispanic (1.8%), White (1.3%)
4	60617	South Chicago	\$ 12,251,669	83,553	15,995	\$ 765.97	19.1%	19.3%	Black (56.2%), Hispanic (37.2%), White (5.9%)
5	60623	South Lawndale	\$ 11,294,199	81,283	16,538	\$ 682.92	20.3%	25.7%	Hispanic (66.8%), Black (29.7%), White (2.9%)
6	60629	Chicago Lawn	\$ 8,245,476	110,029	13,043	\$ 632.18	11.9%	15.9%	Hispanic (71.6%), Black (19.2%), White (7.7%)
7	60649	South Shore	\$ 7,993,293	81,283	15,586	\$ 512.85	19.2%	25.7%	Hispanic (66.8%), Black (29.7%), White (2.9%)
8	60651	Humboldt Park	\$ 7,682,936	63,492	11,180	\$ 687.20	17.6%	22.0%	Black (50.8%), Hispanic (42.9%), White (4.4%)
9	60636	West Englewood	\$ 7,635,740	30,024	7,928	\$ 963.14	26.4%	29.5%	Black (87.8%), Hispanic (9.4%), White (1.5%)
10	60637	Woodlawn	\$ 7,599,503	47,300	12,094	\$ 628.37	25.6%	29.9%	Black (74.9%), White (14.7%), Asian (4.7%)

\*Rank based on all residential customers (non low-income and low-income)

\*\*Source: <https://www.illinois-demographics.com> (U.S. Census Bureau ACS Estimates)

\*\*\*Total arrearage is balance of all balances that are one-month or more overdue

<sup>^</sup>Source: <https://www.unitedstateszipcodes.org>

<sup>^^</sup>All residential customers whose balances are one-month or more overdue



## However, fewer customers have past due balances this year

In April 2020, 1.02 million residential customers had a past due balance of 1-month or more, whereas in April 2021, 797,552 of such customers are behind. **This is a 21.6% decrease.** More flexible, generous, and reasonable DPAs may be one reason there are fewer customers behind.

### Arrearage by Days Past Due ("DPD") (All Residential Customers) (April '21, April '20)

Investor-Owned Utility	% of Residential Customers*: 1-month+ DPD	April 2021 Residential: 1-month+ DPD	% of Residential Customers: 1-month+ DPD	April 2020 Residential: 1-month+ DPD	April 2021 Residential: 2-3 mos. DPD	April 2020 Residential: 2-3 mos. DPD	April 2021 Residential: 3 mos.+ DPD	April 2020 Residential: 3-mos.+ DPD
<b>Commonwealth Edison**</b>	7.64%	283,026	10.64%	392,084	185,742	231,218	148,172	191,924
<b>Ameren Illinois***</b>	5.81%	68,088	9.02%	105,330	41,847	72,016	39,908	64,548
<b>Nicor Gas</b>	6.42%	132,266	9.83%	201,665	19,994	29,972	72,715	118,998
<b>North Shore Gas</b>	15.91%	23,906	16.15%	24,291	5,941	5,461	8,769	8,434
<b>Peoples Gas Light &amp; Coke</b>	31.06%	249,952	30.48%	245,613	55,207	64,436	124,470	111,235
<b>Aqua Illinois**</b>	22.69%	16,701	23.38%	17,221	7,144	8,118	5,482	7,994
<b>Illinois-American Water</b>	6.19%	21,137	8.87%	28,891	1,919	5,534	12,025	10,295
<b>Utility Services of Illinois</b>	19.35%	2,476	17.18%	2,201	627	621	658	333

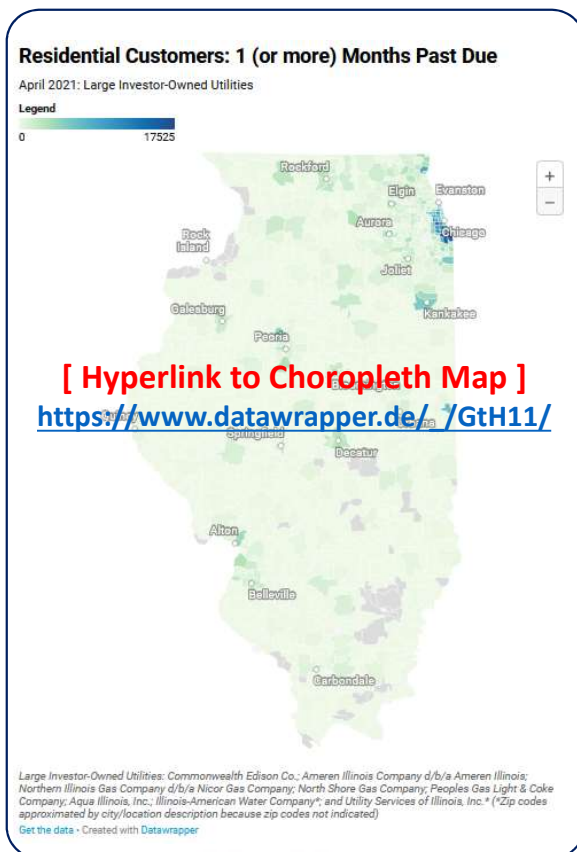
\*% applies May 2020 total residential customers because customer totals unavailable; Ameren uses June 2020 and IAWC uses July 2020 because customer totals unavailable

\*\*The 2-3 mos. DPD column is inclusive of past due accounts greater than 3-mos.

\*\*\*As of April 2021, Ameren indicated that 60,127 residential customers were enrolled in DPAs (compare with April 2020: 30,916 were on DPAs).



# This means residential customers have higher arrearages



- A simple average of the total arrearage and the number of residential customers with an arrearage balance shows that in April 2021, an average arrearage for a large utility customer is \$510, whereas a year ago, that average arrearage was \$374 – **this is an increase of approximately 36.3%.**

## Total Arrearages (All Residential Customers) (April '21, April '20)

Investor-Owned Utility	April 2021 Total Arrearage	April 2020 Total Arrearage	% Change: April '20 to '21
<b>Commonwealth Edison<sup>^</sup></b>	\$ 100,234,866	\$ 109,082,748	-8.11%
<b>Ameren Illinois<sup>*</sup></b>	\$91.8M   \$36.42M	\$68.84M   \$55.58M	33.4%   -34.2%
<b>Nicor Gas</b>	\$ 52,778,251	\$ 63,627,737	-17.1%
<b>North Shore Gas</b>	\$ 9,635,798	\$ 8,125,874	18.6%
<b>Peoples Gas Light &amp; Coke</b>	\$ 176,794,578	\$ 137,092,082	29.0%
<b>Aqua Illinois<sup>^</sup></b>	\$ 2,297,007	\$ 1,876,881	22.4%
<b>Illinois-American Water</b>	\$ 3,588,746	\$ 3,489,858	2.8%
<b>Utility Services of Illinois</b>	\$ 380,876	\$ 191,050	99.4%

\*Two amounts provided: Ameren indicated that \$55.3 million ("M") from \$91.8M in April 2021 total arrearage data (and \$13.3M from \$68.84M in April 2020) was for residential customers enrolled in DPAs (Unbilled DPA Balance).



## Federal & State assistance for residential customers in need

There are many federal and State assistance initiatives that will provide Illinois' utility customers monetary relief during these challenging economic times. These include, but are not limited to, the below:

### Illinois Department of Commerce & Economic Opportunity

**\$100 million** unallocated for households in need of utility bill assistance through the Low-Income Home Energy Assistance Program ("LIHEAP"). The Department anticipates receiving an **additional \$208 million** for utility assistance from the American Rescue Plan Act ("ARPA").



IDHS will distribute **\$95 million** in assistance as part of the December 2020 federal Emergency Rental Assistance stimulus. A portion of those funds will be used to support those in need of utility assistance. In addition, the federal ARPA includes **almost \$500 million** for low-income water assistance.

### Utility Disconnection Avoidance Program (UDAP)

UDAP allocates **\$80 million** to help households in crisis. The expanded assistance measures will grant billing relief for nearly 80,000 current and former LIHEAP customers currently at risk for disconnection and prevent service shutoffs due to a consumer's inability to pay.

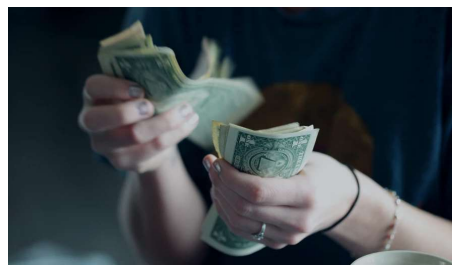


# Key Takeaways & Recommendations<sup>1</sup>



## Require Credit and Collections Reports and Arrearage Data

Data enable the ICC to measure the effectiveness of its regulations, and identify those Illinoisans most vulnerable and in need of its assistance. **Making the (16) metrics large utilities report in Docket No. 20-0309, and arrearage data that shows where/how much customers are behind, permanent requirements would put in place invaluable tools** that the ICC, advocates, and LAAs could use to target efforts and develop new initiatives.



## Order Flexible DPA and Collection Practices Continue

The availability of extended DPAs under the March 15, 2021 stipulation will expire on June 30. Utilities should continue to make these options available for customers. **Commission rules for DPAs provide significant flexibility for utilities to accommodate a customer's energy insecurities and energy burdens.** Utilities have the discretion to offer longer DPAs that account for a customer's ability to successfully complete it, but data show consistently short DPA lengths. See 85 Ill. Adm. Code 280.120(g)(1)-(2).



## Prohibit Disconnections Where Customers Pay Affordable Amount

The Commission should exercise its authority to define, establish, and demand utilities help ensure all Illinois residents "receive essential levels of heat and electric service regardless of economic circumstance." 305 ILCS 20/2(a)(1). To that end, it should **define affordability for energy cost at/below 6% of annual household income**, with an aim towards the national median energy burden of 3.1% of annual household income, and set a standard of 4% of annual household for water and wastewater affordability.

<sup>1</sup> See also Comments of the People of State of Illinois and Reply Comments of the People of the State of Illinois, filed September 30, 2020 and October 30, 2020, respectively, in Docket No. 20-NOI-01, available at <https://www.icc.illinois.gov/notice-of-inquiry/20-noi-01>.



# Questions



“The true measure of any society can be found in how it treats its most vulnerable members.”

~ **MAHATMA GANDHI**





# Thank you!

**THE OFFICE OF THE ATTORNEY GENERAL**  
**OF THE STATE OF ILLINOIS**

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